

GAGE SPENCER & FLEMING LLP

ATTORNEYS AT LAW

410 PARK AVENUE

NEW YORK, NEW YORK 10022

TELEPHONE: (212) 768-4900

FACSIMILE: (212) 768-3629

E-MAIL: [info@gagespencer.com](mailto:info@gagespencer.com)

August 9, 2022

VIA ECF

The Honorable R. Barclay Surrick  
United States District Judge  
Eastern District of Pennsylvania  
601 Market Street  
Philadelphia, PA 19106

Re: *United States v. Aprahamian*, 20-cr-64 (RBS)

Dear Judge Surrick:

We represent Defendant Ara Aprahamian and write in response to the government's August 5, 2022 letter proposing a schedule in this matter (Dkt. 51). Given, among other things, the magnitude of discovery in this case, we respectfully submit that the government's proposed schedule is unrealistic and that Mr. Aprahamian's proposed trial date is more consistent with the need to be adequately prepared for a trial in this matter. We look forward to making a more complete presentation on this issue at today's conference.

Respectfully submitted,

/s/ G. Robert Gage, Jr.

G. Robert Gage, Jr.